

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND (Baltimore)**

In Re:

Kenisha R. Wright
a/k/a Kenisha R. Hubbard,

Debtor
and

Michael Anthony Wheeler,

co-Debtor

Case No. 24-15495
Chapter 13

Consumer Portfolio Services, Inc.

Movant
v.

Kenisha R. Wright
a/k/a Kenisha R. Hubbard,
Michael Anthony Wheeler, co-Debtor
Brian A. Tucci, Trustee

Respondents

**Notice of Motion for Relief From Debtor & Co-Debtor Automatic Stay
as to one (1) 2018 Ford Transit VIN 1FTYR2CM2JKB01565 and
Request for Waiver of 14-Day Stay of Bankruptcy Rule 4001 (a)(3)
and Hearing Thereon**

Movant Consumer Portfolio Services, Inc., has filed with the Court a motion seeking relief from the automatic stay of 11 USC § 362 (a) to enable it to proceed to foreclose on the Collateral more specifically described in the attached Motion for Relief from the Automatic Stay as to one (1) 2018 Ford Transit VIN 1FTYR2CM2JKB01565 and Request for Waiver of the 14-Day Stay of Fed. R. Bank. P. 4001(a)(3). Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the Court to grant the Motion referenced above, or if you want the Court to consider your views on the motion, then by **08/14/2024** you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explain your position and mail a copy to:

Amy K. Kline, *akline@amyklinelaw.com*
35 Franklin Boulevard
Reisterstown, MD 21136

If you mail rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above.

The hearing is scheduled for 09/09/2024 at 1:30 p.m. in Courtroom 9-D at the Baltimore Division, Garmatz Federal Courthouse, 101 West Lombard Street, Baltimore, MD 21201 before the Honorable David E. Rice.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

Date: 07/31/2024

Respectfully submitted,

/s/ Amy K. Kline
Amy K. Kline, 08382
Amy K. Kline Law
35 Franklin Boulevard
Reisterstown, MD 21136
410.526.9551/fax 410.526.9554
akline@amyklinelaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of July 2024 a copy of the Notice of Motion for Relief from the Automatic Stay as to one (1) 2018 Ford Transit VIN 1FTYR2CM2JKB01565 and Request for Waiver of the 14-Day Stay of Fed. R. Bank. P. 4001(a)(3) and Hearing Thereon was transmitted to the following CM/ECF registrants:

Eric S. Steiner, Debtor's Counsel
info@steinerlawgroup.com

Brian A. Tucci, Trustee
ECF@ch13balt.com

And, mail, first class and postage prepaid, to:

Kenisha R. Wright
a/k/a Kenisha R. Hubbard
20 Lambourne Road, Apt. 328
Towson, MD 21204

Michael Anthony Wheeler, co-Debtor
20 Lambourne Road, Apt. 328
Towson, MD 21204

/s/ Amy K. Kline
Amy K. Kline